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January 19, 2024

**VIA ECF**

Honorable James R. Cho  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") (collectively, the "City Defendants") in the above-referenced matter. I write to respectfully request a second, 21-day, extension of City Defendants' time to respond to the Complaint and a matching *sua sponte* extension of the individual Defendants' time to respond.<sup>1</sup>

I am still in the process of completing representation interviews in connection with this office's assessment of whether it will represent the respective individual Defendants. Accordingly, I respectfully request that the Court extend Defendants' time to respond to the Complaint from January 22, 2024, until February 12, 2024, to allow for the completion of the representation interview process. Plaintiffs consent to one further extension of Defendants' time to respond to the Complaint.

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<sup>1</sup> In addition to the City Defendants, the Complaint names as individual Defendants Ariel Semper, Nadine Cenord, Bernadet Jean-Louis, Donna McFadden, Ana Costa, Taiesha Coleman and Leydi Taveras.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez  
Assistant Corporation Counsel